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12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN JOSE DIVISION

16 UNITED STATES OF AMERICA,) NO. 5:24-CR-00491 EJD
 17 Plaintiff,)
 18 v.) STIPULATION TO EXCLUDE TIME FROM
 19 AADITYA CHAND,) NOVEMBER 25, 2024, TO FEBRUARY 10, 2025,
 20 Defendant.) AND [PROPOSED] ORDER
 21)
 22)
 23)
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19 It is hereby stipulated by and between counsel for the United States and counsel for the
 20 defendant Aaditya Chand, that time be excluded under the Speedy Trial Act from November 25, 2024,
 21 through February 10, 2025.

22 At the status conference held on November 25, 2024, the government and counsel for the
 23 defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could
 24 continue to prepare, with a particularized focus on efforts in mitigation including but not limited to the
 25 submission of an apology letter to victims and treatment of Defendant by specialists. For this reason and
 26 as further stated on the record at the status conference, the parties stipulate and agree that excluding time
 27 until February 10, 2025, will allow for the effective preparation of counsel. *See* 18 U.S.C.
 28 § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER

Case No. 5:24-CR-00491-EJD

v. 7/10/2018

1 the time from November 25, 2024, through February 10, 2025, from computation under the Speedy Trial
 2 Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
 3 3161(h)(7)(A), (B)(iv).

4 The undersigned Special Assistant United States Attorney certifies that he has obtained approval
 5 from counsel for the defendant to file this stipulation and proposed order.

6
 7 IT IS SO STIPULATED.

8 DATED: November 29, 2024

9 
 10 JOHNNY E. JAMES JR.
 11 Special Assistant United States Attorney

12 DATED: November 29, 2024

13 
 14 DAVID R. CALLAWAY
 15 Counsel for Defendant Chand

16
 17 [PROPOSED] ORDER

18 Based upon the facts set forth in the stipulation of the parties and the representations made to the
 19 Court on November 25, 2024 and for good cause shown, the Court finds that failing to exclude the time
 20 from November 25, 2024, through February 10, 2025, would unreasonably deny defense counsel and the
 21 defendant the reasonable time necessary for effective preparation, taking into account the exercise of
 22 due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by
 23 excluding the time from November 25, 2024, to February 10, 2025, from computation under the Speedy
 24 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and
 25 with the consent of the parties, IT IS HEREBY ORDERED that the time from November 25, 2024,
 26 through February 10, 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
 27 3161(h)(7)(A), (B)(iv).

28 IT IS SO ORDERED.

29 DATED: December 26, 2024

30 
 31 EDWARD J. DAVILA
 32 United States District Judge